

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CATHERINE ALEXANDER,	)	
	)	
Plaintiff,	)	
	)	Case No: 3:18-cv-0966-SMY-MAB
v.	)	
	)	JURY TRIAL DEMANDED
TAKE-TWO INTERACTIVE SOFTWARE, INC.,	)	
et al.,	)	
	)	
Defendants.	)	

**PLAINTIFF CATHERINE ALEXANDER'S MOTION TO FILE EXHIBIT UNDER SEAL**

Plaintiff Catherine Alexander ("Plaintiff"), by and through her counsel and for her Motion to File Exhibit Under Seal states:

1. On January 22, 2019, the Court issued a Stipulated Protective Order at Dkt. No. 111.
2. Pursuant to Section 9(a) of that Protective Order, "Any Party seeking to file any material under seal shall obtain leave from the Court to do so. The Party requesting leave shall submit the materials sought to be filed under seal to Chambers via e-mail. If the Court grants the Party leave to file under seal, the Party shall file unredacted papers under seal through ECF in conformity with the procedures set forth by the Clerk of Court."
3. Exhibit G to Plaintiff's Memorandum In Support of her Motion for Summary Judgement (Dkt. No. 140-7) contains confidential information as designated by the Parties and as defined in the Protective Order.
4. Plaintiff respectfully requests leave to file Exhibit G, an excerpt from the deposition of Mark Little, one of Take-Two Interactive Software, Inc., 2K Games, Inc., 2K Sports, Inc., and Visual Concepts Entertainment' 30(b)(6) witnesses, under seal.

WHEREFORE, Plaintiff respectfully requests that the Court grant leave for Plaintiff to file Exhibit G to its Memorandum in Support of its Partial Motion for Summary Judgment (Dkt. No. 140-7) under seal.

Dated: November 12, 2019

Respectfully submitted,

/s/ Anthony R. Friedman

Anthony G. Simon, IL 6209056  
Benjamin R. Askew, IL 6291366  
Anthony R. Friedman, IL 6299795  
**THE SIMON LAW FIRM, P.C.**  
800 Market Street, Suite 1700  
St. Louis, Missouri 63101  
Phone: (314) 241-2929  
Fax: (314) 241-2029  
asimon@simonlawpc.com  
basekew@simonlawpc.com  
afriedman@simonlawpc.com

R. Seth Crompton  
**THE HOLLAND LAW FIRM**  
300 N. Tucker, Suite 801  
St. Louis, Missouri 63101  
scrompton@allfela.com  
Phone: (314) 241-8111  
Facsimile: (314) 241-5554

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served upon all counsel of record this 12<sup>th</sup> day of November, 2019 via the Court's CM/ECF system.

/s/ Anthony R. Friedman